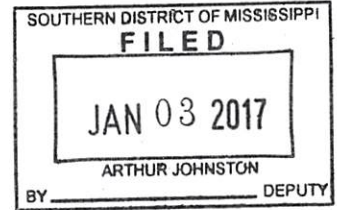


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

1:17cr2LG-JCG

RUSSELL B. MILLER

18 U.S.C. § 371

The United States Attorney charges:

That from in or about September 2009 and continuing through in or about April 2016, in Hancock and Harrison Counties in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **RUSSELL B. MILLER**, did knowingly and willfully conspire with others known and unknown to the Grand Jury, to defraud the United States or commit certain offenses against the United States as follows:

Transmission of Wagering Information, as prohibited by Section 1084, Title 18, United States Code.

Objects of the Conspiracy

The objects of the conspiracy were to:

- a. establish an illegal sports book gambling operation in the United States and Costa Rica;
- b. create a network of agents and facilitators to oversee various groupings of gamblers;
- c. arrange several password-protected, Web-based sports books in Costa Rica for the defendants and gamblers to access on a regular basis;

- d. utilize various methods of moving cash and other funds between the parties to facilitate the gambling operation;
- e. promote and enhance the gambling activities of the members and associates of this conspiracy; and
- f. use of a wire communication facility for the transmission in interstate or foreign commerce of bets or wagers or information assisting in the placing of bets or wagers on sporting events, primarily football.

It was part of the conspiracy that **MILLER** and those with whom he conspired would conceal the nature, scope, and existence of the conspiracy and attempt to shield participants from detection and prosecution.

OVERT ACT

In furtherance of the conspiracy and to carry out its unlawful objectives, the following overt act was committed:

On or around April 24, 2014, **MILLER** and others known and unknown traveled to Costa Rica to deliver a payment to an individual who set up gambling websites for the illegal bookmaking operation.

All in violation of Section 371, Title 18, United States Code.



GREGORY K. DAVIS
United States Attorney